Part 15 Intentional Radiator Questions

Frank de Vall December 17, 2002

We are in the process of changing company name, product model numbers, and product names for a number of previously Part 15 Certified low frequency proximity readers.

The FCC rules state that as long as the FCC ID number remains the same, no changes to the Certifications are necessary.

Certification traceability for the average person looking at the FCC website is the concern. Certificates have an Equipment Class such as "Part 15 Low Power Transmitter Below 1705 kHz" but do not necessarily have a product specifically identified by model and name in the Notes section. WHY DOESN'T THE FCC REQUIRE THIS?

It is usually necessary to pull up applicant submitted documents to find out what the product is. The Form 731 rarely includes product identification. WHY DOESN'T THE FCC REQUIRE THIS?

Things really get sticky when applicant submitted documents were hard copy and submitted before the electronic file era, which wasn't that long ago. In this case you can't pull up applicant submitted documents. IS THERE AN ARCHIVAL STORAGE OF THESE DOCUMENTS?

The only hope now is that the FCC ID characters assigned by the applicant provides a clue to the model number, otherwise you don't have a way to know what product is tied to a FCC ID number.

Should we leave things as they are, with our Certificates, and create confusion for anyone pulling them on the FCC website or should we change them?

Would a Class 1 Permissive Change suffice?

Thanks and Regards,

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